

From: [Smith, Monica](#)
To: [Gray, David](#)
Subject: RE: revised statements on west and williams for Barry Breen
Date: Wednesday, June 26, 2013 8:59:00 AM
Attachments: [SENATE TESTIMONY WEST JUNE 2013.docx](#)

Please start from with the attached file as it includes all the activities from response to current.

From: Gray, David
Sent: Wednesday, June 26, 2013 8:53 AM
To: Coleman, Sam; Edlund, Carl; Smith, Monica; Broyles, Ragan
Cc: Blevins, John; Phillips, Pam
Subject: Re: revised statements on west and williams for Barry Breen

I will be in the office shortly and would like to take a stab at a rewrite.

From: Coleman, Sam
Sent: Wednesday, June 26, 2013 8:46:25 AM
To: Edlund, Carl; Smith, Monica; Broyles, Ragan
Cc: Gray, David; Blevins, John; Phillips, Pam
Subject: RE: revised statements on west and williams for Barry Breen

How will this be used? Needs some more work.

From: Edlund, Carl
Sent: Tuesday, June 25, 2013 11:12 PM
To: Smith, Monica; Broyles, Ragan
Cc: Gray, David; Coleman, Sam; Blevins, John; Phillips, Pam
Subject: RE: revised statements on west and williams for Barry Breen

Much better on Geismer. We need to keep this as short and explicit as possible and not include vague information. Here is my attempt to shorten the thing, add a bit more precision, and add our other responsibilities [we need to add references to our Emergency responses [..the Senator will not parse the difference between 112 [r] people and CERCLA response people. We need to provide Barry with a clear statement about EPA responsiveness

NOTE: I really am struggling with editing features on this web site. I copied your proposal and then edited it. **Stuff I added is in bold and underlined.** Stuff I deleted is gone from my revision.

COMMENTS ARE IN CAPS

What time can we talk about this?

West Fertilizer , West, Texas

Risk Management Plan (RMP) Inspection & Enforcement Update June 25, 2013

EPA Region 6 On Scene Coordinators deployed aerial air quality monitoring measurement the evening of the explosion and deployed staff to the site of the



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explosion less than 24 hours after the event. Region 6 RMP inspectors conducted a reconnaissance visit of the site **X days after** the explosion. **Because** records including the RMP **were** destroyed by the explosion, the RMP/root cause inspection will be **based on ATF, OSHA and CSB reports and their** interviews of the West Fertilizer managers and employees **as they are made available** to determine if there are any actionable violations under CAA 112 (r). EPA Region 6 has coordinated with the **ATF,** CSB and OSHA throughout their investigations. All parties have agreed to share their findings.

NOTE: IS ALL OF THE ABOVE TRUE? CAN'T WE SAY WHEN THE RMP INSPECTORS FORS ARRIVED, DON'T WE WANT TO STATE THAT OUR EMERGENCY RESPONSE ACTIVITIES STARTED THE DAY OF THE EXPLOSION? WHY WERE WE ADDING INFO ABOUT 6/19 LETTERS FROM OSHA [TO WHOM?]; SURELY WE ARE INCLUDING ATF IN OUR COORDINATION

Williams Olefins Explosion, Geismar, Louisiana

Risk Management Plan (RMP) Inspection & Enforcement Update June 25, 2013

The facility is subject to Risk Management Plan under Clean Air Act 112(r). The facility is also subject to EPCRA Tier II reporting requirements and must submit information to the state, local emergency planning committee and fire department.

[Did we deploy OSC's earlier??] EPA Region 6 deployed 2 RMP inspectors to the facility on Monday June 24, 2013, to conduct an RMP/root cause inspection. On Tuesday, June 25, the EPA inspection team toured the facility and reviewed facility documents including the facility specific Process Hazards Analysis to gain a better understanding of the process[es] involved in the explosion. The EPA Region 6 team will continue with the RMP/root cause inspection Wednesday June 26, provided facility personnel responsible for the facility RMP are available **and** no longer involved in OSHA or CSB investigations. The inspectors will evaluate equipment maintenance, operating procedures, employee training, and other elements of the program related to the incident. The duration of the inspection will last 4 days, with follow up as necessary. The duration of the inspection will be driven by the availability and cooperation of the facility personnel. If the EPA team is unable to complete the inspection this week, they will reschedule the inspection for a later date.

WHY ARE WE INCLUDING THE FOLLOWING STATEMENT?: Upon arrival the EPA inspectors were informed that CSB and OSHA are on site conducting interviews with critical facility individuals, the majority of whom will be interviewed by EPA staff. EPA Region 6 staff is coordinating with CSB and OSHA and will offer to share information.

From: Smith, Monica

Sent: Tuesday, June 25, 2013 6:47 PM

To: Edlund, Carl; Broyles, Ragan

Subject: revised statements on west and williams.

West Fertilizer , West, Texas

Risk Management Plan (RMP) Inspection & Enforcement Update June 25, 2013

The Region 6 RMP inspectors conducted a reconnaissance visit of the site within days of the explosion. It is our understanding that all records including the RMP, were in the facility which was destroyed by the explosion. Thus, the RMP/root cause inspection will be limited to interviews of the West Fertilizer management and employees. The RMP inspectors will conduct the root cause/after action inspection once CSB and OSHA have completed their on-site investigations and interviews. EPA Region 6 has coordinated with CSB and OSHA throughout their investigation. All parties have agreed to share their findings. EPA RMP inspectors will review the OSHA and CSB report findings to determine if there are any actionable violations under CAA 112 (r). OSHA, per a letter dated June 19, 2013, was planning to access the site on June 24.

Williams Olefins Explosion, Geismar, Louisiana

Risk Management Plan (RMP) Inspection & Enforcement Update June 25, 2013

The facility is subject to Risk Management Plan under Clean Air Act 112(r). The facility is also subject to EPCRA Tier II reporting requirements and must submit information to the state, local emergency planning committee and fire department.

EPA Region 6 deployed 2 RMP inspectors to the facility on Monday June 24, 2013, to conduct an RMP/root cause inspection of the facility to determine if the cause of the explosion was related to a failure of the risk management plan. Upon arrival the EPA inspectors were informed that CSB and OSHA are on site conducting interviews with critical facility individuals, the majority of whom will be interviewed by EPA staff. EPA Region 6 staff is coordinating with CSB and OSHA and will offer to

share information.

On Tuesday, June 25, the EPA inspection team toured the facility and reviewed facility documents including the facility specific Process Hazards Analysis, as part of the inspection to gain a better understanding of the processes with particular attention to the process involved in the explosion. The EPA Region 6 team will continue with the RMP/root cause inspection Wednesday June 26, provided facility personnel responsible for the facility RMP are available (no longer involved in OSHA or CSB investigations). The inspectors will be evaluating equipment maintenance, operating procedures, employee training, and other elements of the program related to the incident. The duration of the inspection will last 4 days, with follow up as necessary. The duration of the inspection will be driven by the availability and cooperation of the facility personnel. If the EPA team is unable to complete the inspection this week, they will reschedule the inspection for a later date.

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